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August 26, 2024

VIA ECF

Hon. Jennifer L. Rochon
United States District Court, S.D.N.Y.
500 Pearl Street, Room 1010
New York, NY 10007

RE: *Doolittle v. Bloomberg L.P.*, No. 22-CV-09136 (JLR)
Plaintiff's Letter Motion to File Document Under Seal

Dear Judge Rochon:


Pursuant to Section 4(B)(i) of Your Honor's Individual Rules of Practice in Civil Cases, Standing Order 19-MC-00583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, we write on behalf of Plaintiff Abigail Doolittle to seek leave to file under seal an unredacted version of Exhibit A to Ms. Doolittle's forthcoming Letter Motion for Leave to File Response to Defendants' August 23, 2024 Letters (Dkts. 96, 97) Opposing Plaintiff's Letter Motion. Ms. Doolittle seeks to redact references to a document designated as "Confidential" under the parties' Protective Order (Dkt. 55), which contains information concerning Mr. Crumpton's employment history, categorized as "sensitive information" under Section 4(B)(i) of Your Honor's Individual Rules.

While Rule 4(B)(i) of Your Honor's Individual Rules states that Court approval is not required to seal or redact information about an individual's employment history, the e-filing system appears to require a letter motion seeking approval to submit a sealed filing. As such, Ms. Doolittle respectfully requests that the Court grant her leave to file the aforementioned submission under seal.

Plaintiff's request to seal Dkt. 100 is GRANTED. Although the common law right of public access to judicial documents is "firmly rooted in our nation's history," this right is not absolute and courts "must balance competing considerations against" the presumption of access. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (3d Cir. 2006) (quotation marks and citation omitted). Given the sensitive personal information contained in Dkt. 100, the redactions shall remain sealed.

SO ORDERED.

Dated: September 10, 2024
New York, New York


JENNIFER L. ROCHON
United States District Judge

Respectfully submitted,

/s/Daniel Kotchen
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